

Jeffrey W. Dulberg (State Bar No. 181200)
John W. Lucas (State Bar No. 271038)
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067-4003
Telephone: 310.277.6910
Facsimile: 310.201.0760
E-mail: jdulberg@pszjlaw.com
jlucas@pszjlaw.com

Counsel to Bradley D. Sharp, Chapter 11 Trustee

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION**

In re
LESLIE KLEIN,
Debtor.

Case No. 2:23-bk-10990-NB
Chapter 11

BRADLEY D. SHARP, Chapter 11 Trustee,
Plaintiff,
v.

Adv No. 2:25-ap-01020-NB

**FOURTH STIPULATION TO
CONTINUE RESPONSE DATE FOR
DEFENDANT SECURITY LIFE OF
DENVER INSURANCE COMPANY**

LIFE CAPITAL GROUP, LLC, a limited
liability company, SHLOMO Y.
RECHNITZ, individually and as a member
of LIFE CAPITAL GROUP, LLC,
YISROEL ZEV RECHNITZ, an individual,
CHAIM MANELA, an individual,
JONATHAN POLTER, an individual and as a
manager of LIFE CAPITAL GROUP, and
SECURITY LIFE OF DENVER LIFE
INSURANCE COMPANY,
Defendants.

Defendant Security Life of Denver Insurance Company (the “*Defendant*”), and Bradley D.
Sharp, Chapter 11 Trustee (the “*Plaintiff*” or “*Trustee*”), on the other hand, by and through their
respective counsel, hereby stipulate as follows:

RECITALS

- On January 23, 2025, the Trustee filed a Complaint against the Defendant, among
others, commencing adversary proceeding no. 2:25-ap-01020-SK.
- Process has been served upon the Defendant.

3. On February 21, 2025, the Plaintiff and Defendant entered into a stipulation extending the Defendant's time to respond to the Complaint from February 24, 2025 to March 31, 2025 [Adv. Docket No. 10], which was approved by the Court on the same date [Adv. Docket No. 11].

4. On March 28, 2025, the Plaintiff and Defendant entered into a second stipulation extending the Defendant's time to respond to the Complaint from March 31, 2025 to May 20, 2025 [Adv. Docket No. 37], which was approved by the Court on the same date [Adv. Docket No. 38].

5. On May 14, 2025, the Plaintiff and Defendant entered into a third stipulation extending the Defendant's time to respond to the Complaint from May 20, 2025 to July 8, 2025 [Adv. Docket No. 47], which was approved by the Court on the same date [Adv. Docket No. 49].

6. The Plaintiff has agreed to further extend the Defendant's time to respond until August 19, 2025 as set forth herein.

STIPULATION

Subject to Court approval, the parties to this Stipulation hereby stipulate and agree as follows:

A. The date by which the Defendant must file and serve a response to the Complaint is continued from July 8, 2025 through and including August 19, 2025.

B. The Trustee is authorized to lodge an order with the Court incorporating the terms of this Stipulation.

Dated: June 26, 2025

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ John W. Lucas
John W. Lucas

Attorneys for Plaintiff Bradley D. Sharp,
Chapter 11 Trustee

1 Dated: June 26, 2025

McDOWELL HETHERINGTON LLP

2
3 By 
4 _____
5 Daniella McDonagh

6
7
8
9
10 Attorneys for Defendant Security Life of Denver
11 Insurance Company
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
10100 Santa Monica Boulevard, 13th Floor, Los Angeles, California 90067

A true and correct copy of the foregoing document entitled (*specify*): **FOURTH STIPULATION TO CONTINUE RESPONSE DATE FOR DEFENDANT SECURITY LIFE OF DENVER INSURANCE COMPANY** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **June 26, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Michael G D'Alba** mgd@lnbyg.com
- **Jeffrey W Dulberg** jdulberg@pszjlaw.com
- **M. Jonathan Hayes** jhayes@rhmfirm.com, roksana@rhmfirm.com; matt@rhmfirm.com; rosario@rhmfirm.com; sloan@rhmfirm.com; priscilla@rhmfirm.com; rebecca@rhmfirm.com; david@rhmfirm.com; susie@rhmfirm.com; max@rhmfirm.com; russ@rhmfirm.com
- **Matthew A Lesnick** matt@lesnickprince.com, matt@ecf.inforuptcy.com; jmack@lesnickprince.com
- **John W Lucas** jlucas@pszjlaw.com, ocarpio@pszjlaw.com
- **Matthew D. Resnik** matt@rhmfirm.com, roksana@rhmfirm.com; russ@rhmfirm.com; sloan@rhmfirm.com; susie@rhmfirm.com; priscilla@rhmfirm.com; rebecca@rhmfirm.com; rosario@rhmfirm.com; gabriela@rhmfirm.com; david@rhmfirm.com
- **Bradley D. Sharp (TR)** bsharp@dsi.biz
- **Nikko Salvatore Stevens** nikko@cym.law, eService@cym.law, karen@cym.law
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov
- **Beth Ann R. Young** bry@lnbyg.com, bry@lnbyb.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **June 26, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Via Email

John T. Burnite: john.burnite@mhllp.com
Daniella M. McDonagh: daniella.mcdonagh@mhllp.com

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 26 2025
Date

Nancy H. Brown
Printed Name

/s/ Nancy H. Brown
Signature